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UNITED STATES BANKRUPTCY COURT	
SOUTHERN DISTRICT OF NEW YORK	
	x
SECURITIES INVESTOR PROTECTION CORPORATION,	Adversary Proceeding
COR ORATION,	No. 08-01789-BRL
Plaintiff-Applicant,	1.0.00 01,05 2142
v.	SIPA Liquidation
BERNARD L. MADOFF INVESTMENT SECURITIES LLC,	(Substantively Consolidated)
Defendant.	
In re:	X
BERNARD L. MADOFF,	
Debtor.	V
	^^

OBJECTION TO TRUSTEE'S DETERMINATION OF NATHAN B. JOHNSON'S CUSTOMER CLAIM (CLAIM NO. 015834)

Nathan B. Johnson, by and through his attorneys, as and for his objection to the Trustee's determination denying his customer claim (Claim No. 015834), states as follows:<sup>1</sup>

- 1. Mr. Johnson is a "customer" of Bernard L. Madoff Investment Securities LLC ("BLMIS") as that term is defined in the Securities Investor Protection Act ("SIPA"). Mr. Johnson had an account with BLMIS.
- 2. The Trustee's determination denying Mr. Johnson's claim on the ground that he is not a "customer" of BLMIS under SIPA and that he did not have an account with BLMIS is erroneous and contrary to law.
- 3. Accordingly, Mr. Johnson's claim should be allowed in full as filed.
- 4. To the extent applicable, Mr. Johnson joins in the objections of other claimants whose claims have been denied by the Trustee on the same or similar grounds.
- 5. Mr. Johnson reserves the right to revise, supplement, or amend this objection. Any failure to object on a particular ground or grounds shall not be construed as a waiver of Mr. Johnson's right to object on any additional grounds.
- 6. Mr. Johnson reserves the right to subsequently file a memorandum of law and other documentary support in connection with any scheduled hearing and further proceedings of this matter.

<sup>&</sup>lt;sup>1</sup>The Trustee previously granted Mr. Johnson's request for an extension of time in which to file his objection. The extended deadline for filing is February 9, 2011.

7. All further notices concerning this matter should be served upon the undersigned counsel.

Dated: New York, New York January 11, 2011

Respectfully submitted,

LAW OFFICE OF

RICHARD E. SIGNORELLI

By:

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Attorneys for Nathan B. Johnson

## **AFFIRMATION OF SERVICE**

BRYAN HA, an attorney duly admitted to practice before the Courts of the State of New York, affirms under the penalties of perjury pursuant to Title 28, United States Code, Section 1746, that on January 11, 2011 he served a copy of the within Objection To Trustee's Determination Of Nathan B. Johnson's Customer Claim (Claim No. 015834) on the following persons by U.S. First Class Mail:

Clerk of the United States Bankruptcy Court for the Southern District of New York One Bowling Green New York, New York 10004

Irving H. Picard, Trustee c/o Baker & Hostetler LLP Attn: Claims Department 45 Rockefeller Plaza New York, New York 10111

Dated: New York, New York January 11, 2011 Bryan Ha